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7 *Attorneys for Defendant Ted Nielson*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 BRYAN DRYDEN,

12 Plaintiff,

13 v.

14 STATE OF NEVADA, *et al.*,

15 Defendants.

Case No. 2:16-cv-01227-JAD-EJY

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

(THIRD REQUEST)

16 Defendant Ted Nielson, by and through counsel, Aaron D. Ford, Nevada Attorney
17 General, and Lorin M. Taylor, Deputy Attorney General; and Plaintiff Bryan Dryden, by
18 and through counsel Justin V. Alper, hereby submit their second stipulation and agreement
19 to extend the deadline for dispositive motions and respectfully request that the Court
20 extend the dispositive motion deadline for a period of 30 days. The Parties are requesting
21 the modify in good faith and the request is supported by good cause.

22 LR 26-3 requires that the extension of any date set by the discovery plan, scheduling
23 order, or other order must—as well as satisfying the requirements of LR IA 6-1 to explain
24 the reasons an extension is needed—demonstrate good cause for the extension.

25 Good cause to extend the deadline for dispositive motions exists. The dispositive
26 motions deadline is currently set for Saturday, May 13, 2023. In reviewing the grounds for
27 what would be Defendant’s second Motion for Summary Judgment, Defendant requires
28 additional time to determine if there is enough new evidence to justify a new dispositive

1 motion or if such a motion would be entirely duplicative of ECF No. 137, which would be a
2 waste of the Parties' and this Court's time and resources. Neither party wants to do that,
3 and the additional 30-days will allow the Parties to determine if a new Motion for Summary
4 Judgment ought to be filed or if they should proceed to the Joint Pretrial Order.

5 Based on the foregoing, the Parties submit that good cause exists to grant the
6 requested extension and that the deadline for dispositive motions shall be extended 30 days
7 up to and including Monday, June 12, 2023.

8
9 DATED this 13th day of May, 2023
10 and respectfully submitted by:
AARON D. FORD
11 Attorney General

12 /s/ Lorin M Taylor
LORIN M. TAYLOR (Bar No. 14958)
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14 Attorneys for Defendant

DATED this 13th day of May, 2023
and approved as to form and content by:

/s/ Justin V. Alper
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Attorney for Plaintiff

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17 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE
21 DATED: May 15, 2023